



DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

STATE OF OKLAHOMA } S.S.  
CLEVELAND COUNTY }

**FILED**

JUL 26 2022

In the office of the  
Court Clerk MARILYN WILLIAMS

ELANE TRAN NGUYEN,

Plaintiff,

vs.

ROADLINK EXPRESS, INC., &  
RITA MAE MCLEOD

Defendants.

Case No. CJ-2022-838

**JURY TRIAL DEMANDED  
ATTORNEY LIEN CLAIMED**

**PETITION**

Elane Tran Nguyen, ("Plaintiff"), for her claims and causes of action against Defendants, Roadlink Express, Inc. ("Roadlink") and Rita Mae McLeod ("McCleod"), alleges and states as follows:

1. Plaintiff is a resident of Oklahoma County.
2. Defendant, Roadlink Express Inc, is a Minnesota corporation with its principal place of business in Ham Lake, Minnesota.
3. Defendant, Rita Mae McLeod, is a resident of North Carolina and an employee of Roadlink Express Inc.
4. The truck accident giving rise to this action occurred in Cleveland County, Oklahoma.
5. On November 9, 2021, Plaintiff was traveling Northbound on I-35 near the South 4<sup>th</sup> Street entrance ramp in Moore, Oklahoma.
6. Plaintiff was in the far-right lane when the Roadlink truck driving next to her came into her lane and collided with the driver's side door of Plaintiff's car.

EXHIBIT

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7. The collision caused Plaintiff's car to rotate sideways, and then the Roadlink truck collided with Plaintiff's car again forcing it across the highway where it eventually came to rest on the far-left shoulder.

8. As a result of the collision, Plaintiff suffered personal injuries, including physical and mental pain and suffering, and property damages in excess of \$75,000.

9. At all relevant times, Plaintiff obeyed all traffic regulations and laws, acted in a reasonable and prudent manner, and was free from any contributory negligence or fault of any kind.

10. At all relevant times, McCleod was acting as an agent or employee of Roadlink and her conduct was within the scope of such agency or employment.

11. McCleod failed to obey traffic regulations and laws or otherwise use ordinary care to prevent injury to Plaintiff.

12. Upon information and belief, Roadlink failed to use ordinary care to avoid entrusting the operation of the truck to McCleod, who it knew or reasonably should have known was inexperienced, careless, reckless, unqualified, and/or incompetent to drive.

13. Defendants' conduct was grossly negligent and/or in reckless disregard for the rights and safety of others, warranting an award of punitive damages.

WHEREFORE Plaintiff respectfully prays for judgment against Defendant for compensatory and punitive damages in excess of \$75,000, plus interest, attorney fees, costs, and all further relief the Court deems just and proper.

Respectfully Submitted,



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